

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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| NSTAR Gas Company Adjudicatory Proceeding |) | D.T.E. 05-36 |
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**DISCOVERY ISSUED TO NSTAR GAS COMPANY BY THE DIVISION OF PIPELINE
ENGINEERING AND SAFETY, DEPARTMENT OF TELECOMMUNICATIONS AND
ENERGY**

- PESD-1. Please provide a map or description of the “Business Districts” as defined in 220 C.M.R. § 101.06(21)(a) for the Town of Hopkinton.
- PESD-2. Please provide any and all documents recording or memorializing any visits by NSTAR Gas Company personnel or contractor personnel to 65 Main Street, Hopkinton between and including the date gas service was first provided to the building and July 24, 2002.
- PESD-3. Please provide any and all documents recording or memorializing the results of NSTAR Gas Company personnel or contractor personnel inspections, surveys, or monitoring of the interior segment of the service pipeline at 65 Main Street, Hopkinton between and including the date from the service pipeline installation to July 24, 2002.
- PESD-4. Please provide any and all documents recording or memorializing any atmospheric corrosion evaluation, monitoring, or control by NSTAR Gas Company or its contractor for the interior segment of the service pipeline at 65 Main Street, Hopkinton since installation of the plastic segment of the service pipeline.
- PESD-5. Please provide any and all documents recording or memorializing any leakage surveys of NSTAR gas facilities and equipment located inside the structure at 65 Main Street, Hopkinton, in accordance with NSTAR Gas Company’s written procedures, conducted during leakage surveys of the Business District of Hopkinton on January 10, 2002, July 2, 2002, or on any other date from January 1, 2000 to July 24, 2002.
- PESD-6. Please provide any and all documents recording or memorializing any leakage survey conducted by NSTAR Gas Company in the Business District of Hopkinton from January 1, 2000 to July 24, 2002.

- PESD-7. Please provide any and all documents recording or memorializing any pressure test establishing a maximum allowable operating pressure (“MAOP”) pursuant to 49 C.F.R. § 192.619 prior to activating the plastic segment of the service pipeline at 65 Main Street, Hopkinton.
- PESD-8. Please provide any and all documents establishing the MAOP of the plastic segment of the service pipeline prior to its installation at 65 Main Street, Hopkinton in 1974.
- PESD-9. Please provide your response(s) to the NOPV, D.T.E. 03-PL-19 issued to NSTAR Gas Company on November 7, 2003.
- PESD-10. Please provide any and all documents in support of your reply to the NOPV, D.T.E. 03-PL-19 in which NSTAR Gas Company disputes the alleged violations contained in the NOPV pursuant to 220 C.M.R. § 69.04(1)(d).
- PESD-11. Please provide all provisions of NSTAR Gas Company’s written procedures required by 49 C.F.R. § 192.605 that apply to corrosion control.
- PESD-12. Please provide any and all documents substantiating NSTAR Gas Company’s compliance with its written procedures related to corrosion control for the service pipeline at 65 Main Street, Hopkinton prior to July 24, 2002.
- PESD-13. Please provide all provisions of NSTAR Gas Company’s written procedures required by 49 C.F.R. § 192.605 that apply to leakage surveys for distribution systems in Business Districts.
- PESD-14. Please provide any and all documents substantiating NSTAR Gas Company’s compliance with its written procedures related to leakage surveys for the service pipeline and other operator equipment at 65 Main Street, Hopkinton.
- PESD-15. Please provide all provisions of NSTAR Gas Company’s written procedures required by 49 C.F.R. § 192.605 that apply to the establishment of a MAOP for pipelines operating at pressures less than 100 psig.
- PESD-16. Please provide any and all documents substantiating NSTAR Gas Company’s compliance with its written procedures related to the establishment of a MAOP for the plastic segment of the service pipeline installed at 65 Main Street, Hopkinton.
- PESD-17. Please provide all provisions of NSTAR Gas Company’s written procedures that apply to the retention of records in association with corrosion control, leak surveying, and the establishment of an MAOP as required by 49 C.F.R. §§ 603(b) and 605.

- PESD-18. Please support NSTAR Gas Company's statement in its response to the NOPV, D.T.E. 03-PL-19 that federal regulations do not require the retention of pressure test records for service pipelines, including the plastic segment of the service pipeline installed at 65 Main Street, Hopkinton.
- PESD-19. Please support NSTAR Gas Company's statement in its response to the NOPV, D.T.E. 03-PL-19 that atmospheric corrosion monitoring and control are not applicable to interior segments of service pipelines.
- PESD-20. Please provide all statements or testimony by NSTAR Gas Company personnel, representatives, or contractor personnel in support of NSTAR Gas Company's reply to the NOPV, D.T.E. 03-PL-19.